

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE  
NO. 02-466, JUDGE JOHN RENKE, III

SC03-1846

AFFIDAVIT OF JOHN RENKE II IN SUPPORT OF  
OBJECTION TO "SUBPOENA DUCES TECUM FOR DEPOSITION"  
AND MOTION FOR PROTECTIVE ORDER

STATE OF FLORIDA  
COUNTY OF PASCO

Before me, the undersigned Notary Public, personally appeared John Renke II and he deposes and states as follows:

1. My name is John Renke II and I make this Affidavit based on my personal knowledge and I am competent to testify to the following facts.
2. The "Subpoena Duces Tecum for Deposition" issued by the J.Q.C. on May 4, 2005 was never served on me, but was dropped off at my office when I was not present on May 4, 2005.
3. I do not have Federal Income Tax Returns and schedules or attachments thereto for 1995, 1996, 1997 or 1998.
4. I will produce the paychecks that I delivered to John K. Renke III for the years 1999, 2000, 2001 and 2002 at the scheduled deposition on May 23, 2005.
5. I will provide copies of 1099's to counsel for the J.Q.C. at my deposition on May 23, 2005.
6. I will provide copies of appropriately redacted settlement statements for major cases that settled during 2002 as well as some time and billing records for these major cases.
7. The compensation paid John K. Renke III is not specifically stated in any of my income tax returns.
8. Amounts of income from specific settlements is lumped in with all my other professional income and not stated separately in any of my tax returns.
9. I will voluntarily provide documentary evidence of the compensation I paid to John K. Renke III for the years that I still have federal income tax returns.
10. My Federal Income Tax Returns contain a great deal of private, irrelevant information such as types and amounts of deductions, sources and amounts or my

income and my spouse's income, my spouse's Social Security Number and my Social Security Number.

11. I do not have any billing slips, time records or other recorded time or billing compilations for work performed by John Renke III, Thomas Gurran, and John K. Renke II records for files of matters that were closed during 1995, 1996, 1997 and 1998.

12. Regarding any such billing slips, time records or other recorded time or billing compilations, I have no central file from which the requested documents could easily and readily be retrieved. The requested documents are scattered throughout hundreds of files. I could not possibly retrieve all of the requested documents without expending great amounts of both time and money; I would have to close down my law office for weeks in order to retrieve all of the requested documents; I would lose income and possible clients if I were forced to close my law office in order to comply with the production request. Therefore, the requests are unduly burdensome and oppressive.

13. I am unaware of having any documents in my possession responsive to request for production number 5 in Exhibit A attached to the May 4, 2005 Subpoena Duces Tecum for Deposition.

14. I have no idea who "the other Republican candidates for judge in the 2002" were.

15. I am an attorney and a member of the Florida Bar and I am representing myself in this matter.

---

John Renke II

SWORN TO and SUBSCRIBED before me by John Renke this \_\_\_\_ day of May, 2005. John Renke is personally known to me.

---

Notary Public